



RAYMOND NARDO, P.C.

ATTORNEY AT LAW

129 THIRD STREET, MINEOLA, NY 11501

Phone: (516)248-2121 | Fax: (516)742-7675 | Email Raymondnardo@gmail.com

June 4, 2020

BY ECF

Hon. Judge George B. Daniels
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square / Courtroom 11A
New York, NY 10007

Re: *Needelman v. Otis Elevator Company, Inc.*
18-7157 (GBD)

SO ORDERED
JUN 08 2020 The initial conference is
adjourned from June 17, 2020
to September 9, 2020

George B. Daniels
HON. GEORGE B. DANIELS

Hon. Judge Daniels,

I represent the plaintiff in the above matter. The parties have requested and exchanged extensive paper discovery consisting of thousands of pages of documents and ESI and completed five depositions, including a non-party witness. Additionally, the parties have supplemented their document productions based on information that came to light during these depositions. Due to the current COVID-19 pandemic, the parties are still working on supplementing their document productions and are nearly complete with such supplemental productions. Furthermore, the parties have resumed discussions towards a potential resolution.

Consequently, the parties request a 60 day adjournment of the June 17, 2020 conference with Your Honor so that we can continue our discussions towards resolution and complete supplementing our written discovery productions based on the testimony given by those previously deposed.

Thank you for your consideration.

Respectfully submitted,

[Signature]
RAYMOND NARDO, ESQ.

RN:rn

cc: Howard Wexler, Esq. (by ECF)